

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: INTEREST RATE SWAPS ANTITRUST
LITIGATION

MDL No. 2704
Master Docket No.
16 MD 2704 (PAE)

This Document Pertains To:

ALL CASES

**NOTICE OF DEALER DEFENDANTS' RENEWED
JOINT MOTION TO DISMISS ALL CLAIMS**

PLEASE TAKE NOTICE that upon the accompanying (i) Dealer Defendants' Memorandum in Support of Their Renewed Joint Motion to Dismiss All Claims, dated January 20, 2017, and (ii) Declaration of John S. Playforth dated January 19, 2017 and the exhibits thereto, the undersigned Defendants will move this Court, before the Honorable Judge Paul A. Engelmayer, at the United States Courthouse, Courtroom 1305, 40 Foley Square, New York, New York on a date and time to be determined by the Court, for an Order dismissing all claims with prejudice for failure to state a claim upon which relief can be granted under Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court may deem just and proper.

January 20, 2017

Respectfully submitted,

s/ Robert D. Wick

Robert D. Wick

Andrew D. Lazerow

John S. Playforth

Katharine Mitchell-Tombras

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001

Telephone: (202) 662-6000

Facsimile: (202) 662-6291

rwick@cov.com

alazerow@cov.com

jplayforth@cov.com

kmitchelltombras@cov.com

*Attorneys for Defendants JPMorgan Chase &
Co.; JPMorgan Chase Bank, N.A.; J.P. Morgan
Securities LLC; and J.P. Morgan Securities plc*

s/ Kenneth A. Gallo (on consent)¹

Brad S. Karp
Julia Tarver-Mason Wood
William A. Clareman
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
bkarp@paulweiss.com
jwood@paulweiss.com
wclareman@paulweiss.com

Kenneth A. Gallo
Roberto J. Gonzalez
Ravi Romel Sharma
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
2001 K Street NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
kgallo@paulweiss.com
rgonzalez@paulweiss.com
rsharma@paulweiss.com

*Attorneys for Defendants Citigroup Inc.;
Citibank, N.A.; Citigroup Global Markets Inc.;
and Citigroup Global Markets Limited*

¹ Defendants use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

s/ Margaret M. Zwisler (on consent)

James E. Brandt
Christopher J. Clark
Lawrence E. Buterman
LATHAM & WATKINS LLP
885 Third Avenue
New York, NY 10022
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
james.brandt@lw.com
chris.clark@lw.com
lawrence.buterman@lw.com

Margaret M. Zwisler
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
margaret.zwisler@lw.com

*Attorneys for Defendants Barclays PLC;
Barclays Bank plc; and Barclays Capital Inc.*

s/ Adam S. Hakki (on consent)

Adam S. Hakki
Richard F. Schwed
Keith R. Palfin
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-4000
ahakki@shearman.com
rschwed@shearman.com
kpalfin@shearman.com

*Attorneys for Defendants Bank of America
Corporation, Bank of America, N.A., and
Merrill Lynch, Pierce, Fenner & Smith
Incorporated*

s/ Marshall H. Fishman (on consent)
Marshall H. Fishman
Elizabeth Zito
FRESHFIELDS BRUCKHAUS DERINGER US LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 277-4000
Facsimile: (212) 277-4001
marshall.fishman@freshfields.com
elizabeth.zito@freshfields.com

*Attorneys for Defendants BNP Paribas, S.A.
and BNP Paribas Securities Corp.*

s/ David G. Januszewski (on consent)
David G. Januszewski
Herbert S. Washer
Elai Katz
Jason M. Hall
CAHILL GORDON & REINDEL LLP
80 Pine Street
New York, NY 10005
Telephone: (212) 701-3000
Facsimile: (212) 269-5420
djanuszewski@cahill.com
hwasher@cahill.com
ekatz@cahill.com
jhall@cahill.com

*Attorneys for Defendants Credit Suisse AG;
Credit Suisse Group AG; Credit Suisse
Securities (USA) LLC; and Credit Suisse
International*

s/ Tracy V. Schaffer (on consent)

Tracy V. Schaffer

Eric P. Stephens

JONES DAY

222 East 41st Street

New York, NY 10017

Telephone: (212) 326-3939

Facsimile: (212) 755-7306

tschaffer@jonesday.com

epstephens@jonesday.com

Paula W. Render

JONES DAY

77 West Wacker

Chicago, IL 60601

Telephone: (312) 782-3939

Facsimile: (312) 782-8585

prender@jonesday.com

*Attorneys for Defendants Deutsche Bank AG
and Deutsche Bank Securities Inc.*

s/ Robert Y. Sperling (on consent)

Robert Y. Sperling
Joseph L. Motto
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-7941
Facsimile: (312) 558-5700
rsperling@winston.com
jmotto@winston.com

Elizabeth P. Papez
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, DC 20006
Telephone: (202) 282-5000
Facsimile: (202) 282-5100
epapez@winston.com

Richard C. Pepperman II
Mark S. Geiger
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
peppermanr@sullcrom.com
geigerm@sullcrom.com

*Attorneys for Defendants The Goldman Sachs
Group, Inc.; Goldman, Sachs & Co.; Goldman
Sachs Bank USA; Goldman Sachs Financial
Markets, LP; and Goldman Sachs International*

s/ Andrew S. Marovitz (on consent)

Andrew S. Marovitz
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606-4637
Telephone: (312) 701-7116
Fax: (312) 706-8651
amarovitz@mayerbrown.com

*Attorneys for Defendants HSBC Bank plc;
HSBC Bank USA, N.A.; HSBC Securities (USA)
Inc.*

s/ Daniel Slifkin (on consent)

Daniel Slifkin
Michael A. Paskin
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, NY 10019-7475
Telephone: (212) 474-1000
Facsimile: (212) 474-3700
dslifkin@cravath.com
mpaskin@cravath.com

*Attorney for Defendants Morgan Stanley;
Morgan Stanley Bank, N.A.; Morgan Stanley &
Co. LLC; Morgan Stanley Capital Services
LLC; Morgan Stanley Derivative Products Inc.;
Morgan Stanley & Co. International plc; and
Morgan Stanley Bank International Limited*

s/ Arthur J. Burke (on consent)

Arthur J. Burke
James I. McClammy
Rebecca L. Martin
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
arthur.burke@davispolk.com
james.mcclammy@davispolk.com
rebecca.martin@davispolk.com

*Attorneys for Defendants The Royal Bank of
Scotland Group plc; Royal Bank of Scotland
plc; and RBS Securities Inc.*

s/ David C. Bohan (on consent)

David C. Bohan
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Facsimile: (312) 902-1061
david.bohan@kattenlaw.com

Daniel G. Swanson
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: (213) 229-7000
Facsimile: (213) 229-7520
dswanson@gibsondunn.com

*Attorneys for Defendants UBS AG and UBS
Securities LLC*